

### REMARKS

Reconsideration of the above-identified application, as amended, is respectfully requested.

In the Official Action dated December 23, 2003, the Examiner first objected to various minor informalities in the Specification on pages 3-5. Applicants have addressed the Examiner's objections by amending paragraphs on pages 3-5 on the specification. The Examiner further objected to the Abstract as exceeding the word limitation. Applicants hereby delete the original specification and submit a new Abstract that, it is respectfully submitted, is now in compliance with the rules.

More substantively, the Examiner rejected pending Claims 1-18 under 35 U.S.C. §102(e), as being allegedly anticipated by Clendinning (U.S. Patent Publication No. 2002/0107861 A1) (hereinafter "Clendinning").

With respect to the rejection of Claims 1-18 as anticipated by Clendinning, applicants respectfully disagree primarily for the reason that Clendinning is not oriented to knowledge-based systems originating from the context of Artificial Intelligence. With respect to the rejection of independent Claims 1, 9 and 15, applicants respectfully submit that "rulesets" as claimed in the claims are not synonymous with "databases" as the Examiner broadly interprets and asserts in the rejection. More specifically, the present invention relates to rule-sets applied in rule-based systems, e.g., expert systems that encode knowledge of a human expert, and comprise logic. Logic, in such rule-based systems are represented by rule-sets and comprise rules, e.g., provided in the form of if-then-else patterns, that are implemented specifically to separate the logic from data which are facts and assertions. Rule-based systems or, expert systems, are implemented in any human knowledge context, for

example, business policy, and lends itself to implementation of rule-based applications. For example, as set forth in the specification at page 8, lines 5-17, and at page 9, lines 11-14, the rule-sets include policy (e.g., business policy). Thus, to clarify the present invention, independent Claims 1, 9 and 15 have been amended to set forth that rulesets implement a policy which is fully supported by the specification. "Policy", when implemented, according to the invention, may be defined as: a definite goal, course or method of action to guide and determine present and future decisions. "Policies" are implemented or executed within a particular context (such as policies defined within a business unit). Network Working Group Request for Comments (RFC 3198), "Terminology for Policy-Based Management," The Internet Society, November 2001 (<http://www.ietf.org/rfc/rfc3198.txt>). Thus, in the present invention, for example, as claimed in amended Claims 1, 9 and 15, it is business policies, represented as rule-sets, that are being merged.

Respectfully, Clendinning is not applicable as it is only directed to the data (fact assertions) portion of a rule based system, and, specifically, only in the context of vendor product information. This data is contained in a database, and Clendinning is directed to collecting and organizing product information from myriad of vendor resources (e.g., web-sites) and in various forms, for storage in a database in an efficient way to facilitate the structured presentation of the information.

Respectfully, Clendinning does not implement rule-based systems in the manner as set forth in the claims setting forth the present invention. That is, Clendinning does not provide feature of assimilating rulesets (business policies) to produce a new merged ruleset comprising logic required for resolving potential conflicts among rules in accordance with a merge policy comprising a set of specifications of partially-ordered priorities and/or


mutual-exclusion constraints. Clendinning, rather, teaches assimilation of data for presentation in a common format via an interface, and does not resolve potential conflicts among rules as set forth in the claims of the present invention. That is, Clendinning provides a “normalization” engine (See ¶ [0042] of Clendinning) that performs a translation function on data to ensure that data is canonically represented as a product having attribute and value pairs. Further, while Clendinning teaches a product mapping, this is not suggestive as a ruleset merge policy as in the present invention. The merging performed in Clendinning is the merging of data (data from a vendor’s web-site) into a database, and not a rule-set merge, as set forth in the claims of the invention. For example, the merge described in Clendinning (see, for example, ¶[0047] of Clendinning) is actually a comparison of an item (product) to be displayed against a product map (listing vendor products and corresponding identifiers). If the new product is not found in the list, it is added (merged) with new attribute-value pairs, and thereafter, normalized within the database after consultation with various “alias” lists for attributes, values and domains. Thus, while ¶ [0046] of Clendinning cited by the Examiner in his rejection of independent Claims 1, 9 and 15 includes terms such as “assimilate” and “merge”, as in the claims of the present invention, it is of a completely different technology context, and, respectfully, does not render the instant invention anticipated nor obvious.

In sum, Clendinning does not assimilate rulesets to produce a new merged ruleset comprising logic required for resolving potential conflicts among rules in accordance with a merge policy comprising a set of specifications of partially-ordered priorities and/or mutual-exclusion constraints. That is, Clendinning does not merge business logic rules (e.g., policy implemented as a series of if-then-else patterns) as the present invention is directed and set forth in the independent Claims. Therefore, it is respectfully requested that

the Examiner withdraw the rejections of Claims 1, 9 and 15 as being anticipated by Clendinning, and further, withdraw the rejections of all claims dependent upon Claims 1, 9 and 15.

In view of the foregoing remarks herein, it is respectfully submitted that this application is in condition for allowance. Accordingly, it is respectfully requested that this application be allowed and a Notice of Allowance be issued. If the Examiner believes that a telephone conference with the Applicants' attorneys would be advantageous to the disposition of this case, the Examiner is requested to telephone the undersigned, Applicants' attorney, at the following telephone number: (516) 742-4343.

Respectfully submitted,



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